

**Exhibit A**

**Proposed Order**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*

Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**ORDER GRANTING FRESENIUS MEDICAL CARE’S UNOPPOSED URGENT  
MOTION TO EXTEND DEADLINE TO FILE RESPONSE TO THE FIVE HUNDRED  
SIXTY-FIRST OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE  
COMMONWEALTH OF PUERTO RICO, PUERTO RICO HIGHWAYS AND  
TRANSPORTATION AUTHORITY, AND PUERTO RICO PUBLIC BUILDINGS  
AUTHORITY TO DEFICIENT CLAIMS**

Upon consideration of *Fresenius Medical Care’s Unopposed Urgent Motion To Extend Deadline To File The Response To Five Hundred Sixty-First Omnibus Objection (Non-Substantive) Of The Commonwealth Of Puerto Rico, Puerto Rico Highways And Transportation Authority, And Puerto Rico Public Buildings Authority To Deficient Claims* (the “Urgent Motion”) filed by Fresenius Medical Care (“Fresenius”), and the Court having jurisdiction over this matter under 28 U.S.C. 1331, and under section 306(a)-(b) of PROMESA, 48 U.S.C. §2166(a)-(b); and venue being proper under section 307(a) of PROMESA, 48 U.S.C. § 2167(a); and the Court having

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<sup>1</sup> The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566(LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801).

reviewed the Urgent Motion and determining that the legal and factual bases set forth therein establish just cause for the relief requested in the Urgent Motion; and after due deliberation and sufficient cause appearing therefore, it is hereby

**ORDERED** that the Urgent Motion is hereby granted in its entirety;

**ORDERED** that Fresenius' deadline to file its response to the *Five Hundred Sixty-first Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Puerto Rico Public Buildings Authority to Deficient Claims* filed on January 27, 2023 will be March 27, 2023;

**ORDERED** that this Court shall retain jurisdiction with respect to all matters relating to the interpretation and implementation of this Order.

Dated: February 27, 2023.

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Honorable Laura Taylor Swain  
United States District Judge